REMARKS

The present response amends the specification and abstract merely as to form. In addition, claims 1, 14, and 17 have been amended. Claims 1-20 remain pending in the captioned case. Further examination and reconsideration of the presently claimed application are respectfully requested.

Objection to the Specification

An objection was lodged against the specification for various informalities. In response thereto, the specification has been amended in a manner believed to address the concerns expressed in the Office Action. Accordingly, Applicants respectfully request removal of this objection.

Section 112 Rejection

Claims 4 and 5 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. In particular, the claims were rejected for containing the trade name Java. In response thereto claims 4 and 5 have been amended in a manner believed to obviate this rejection. Accordingly, Applicants respectfully request removal of this rejection.

Section 101 Rejection

Claims 14-20 were rejected under 35 U.S.C. § 101 as directed to non-statutory subject matter. In response thereto, independent claims 14 and 17 have been amended in a manner believed to identify the subject matter as one of the four statutory categories. Accordingly, Applicants respectfully request removal of this rejection.

Section 102 Rejection

Claims 1, 2, 6-14, and 16 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,874,141 to Swamy et al. (hereinafter "Swamy"). The standard for "anticipation" is one of fairly strict identity. A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art of reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); MPEP 2131. Furthermore, anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, as arranged in the claim. *W.L. Gore & Assocs. V. Garlock*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983). Using these standards, Applicants submit the cited art fails to disclose each and every element of the currently pending claims, some distinctive features of which are set forth in more detail below.

The diagrams used in Swamy show the relationships between the source and target schema for the maps. The Swamy diagram is declarative and requires a compiler to generate code for an execution engine to perform the data transformation. In the present application, components are assembled into applications or higher order components. The compiler is responsible for ensuring that components are linked correctly (port data type checking and synthesis) and to resolve references to composite components. The executor is responsible for initializing and running the components, and for conveying data across the links. The dataflow graph is actually executed. In the present application, the components perform the data transformations in contrast to Swamy.

In Swamy, links are used to relate nodes in the source and target trees to one another or to the ports on functoids. In Swamy, a functoid appears to be a component that operates one or more scalar components to produce a single scalar output. The links may imply flow of data; however, the actual movement of data is determined by analysis of the source and target schemas and is performed by the engine. However, in the present invention, the diagrams are dataflow graphs where the links represent components that convey data from output port to input port. In fact, the links, ports, and map components are all real components in the framework of the present invention.

The compilation operation in Swamy uses the mapping to generate code in a host language that can be executed by an engine or processor to perform the translation or transformation of data in the source tree structure to data that conforms with the target tree structure. In the present invention, the compilation process prepares assemblies of components for execution. This process involves the loading and expansion of static subassemblies (composite components), configuration of components, the type synthesis of generic ports, and the optimization of the dataflow graph. There is no generation of code in a different host language. Swamy does not generate an executable dataflow application as called for in present claim 14.

In the system described by Swamy, the mapping is translated into a host language by the invention. It is in fact a system for code generation. In the exemplary implementation the target language for the code generator is XSLT. However, the present application describes a framework for assembling components into applications or higher order components. The foundation components and scalar map components, are written by users in a host language and conform to interfaces defined in the framework.

Swamy does not perform port data type synthesis. In fact, it would appear that the Swamy invention treats all data as strings of text. In addition, the compilation process used in the Swamy invention does not produce an executable dataflow graph. The result in the preferred implementation is an XSLT script. That is, Swamy does not create an executable dataflow application.

For at least the reasons set forth above, Applicants believe that present claims 1, 2, 6-14, and 16 are not anticipated by Swamy. Accordingly, Applicants respectfully request removal of this rejection.

Section 103 Rejection

Claims 3 and 15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Swamy in view of U.S. Patent No. 6,947,947 to Block et al. (hereinafter "Block"). Claims 17-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Swamy in view of U.S. Patent No. 6,449,619 to Colliat et al. (hereinafter "Colliat").

For at least the reasons stated above in response to the § 102 rejection, Applicants assert that Swamy does not teach nor can Swamy be combined with Block or Colliat to arrive at the teachings of present claims 3, 15, and 17-20. Accordingly, Applicants respectfully request removal of this rejection.

CONCLUSION

The present amendment and response is believed to be a complete response to the issues raised in the Office Action mailed January 10, 2007. In view of the remarks herein, Applicants assert that claims 1-20 are in condition for allowance. If the Examiner has any questions, comments or suggestions, the undersigned attorney earnestly requests a telephone conference.

No fees are required for filing this amendment; however, the Commissioner is authorized to charge any additional fees which may be required, or credit any overpayment, to Daffer McDaniel, LLP Deposit Account No. 50-3268.

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